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April 1, 2024

BY ECF


Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Virginia Marisol Lemus Recinos
23 Cr. 464 (AS)**

Application granted.

The Clerk of Court is directed to
terminate the motion at Dkt. 16.

SO ORDERED.


Arun Subramanian, U.S.D.J.
Date: April 1, 2024

Dear Judge Subramanian:

With the consent of the Pretrial Services Agency, I write to request that Ms. Lemus Recinos be placed on a curfew set by the Pretrial Services Agency, removing the condition of home detention.

As background, Ms. Lemus Recinos was presented before Judge Gorenstein on a complaint charging one count of conspiracy to distribute narcotics on August 9, 2023. She was released the same day on a \$50,000 bond, with home detention enforced by location monitoring, and other conditions, including the surrender of travel documents.

Ms. Lemus Recinos has been fully compliant with her conditions of release since her presentment. At this time, I request that the Court remove the condition of home detention and replace it with a curfew, with hours to be set by Pretrial Services, enforced by Location Monitoring. I request this modification because Ms. Lemus Recinos is the sole caretaker of her minor daughter and it has been very challenging for her to not be able to spend time with her daughter outside of the home over the last 7 months. Home detention does not allow her to do even the little things like take her daughter school shopping or meet her at the bus stop. Moreover, for her own mental health, a modification to curfew would allow Ms. Lemus Recinos to leave the home during designated hours to take walks and get fresh air.

As mentioned above, the Pretrial Services Agency consents to this modification. The Government defers to Pretrial.

Respectfully submitted,

/s/

Zawadi Baharanyi

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CC: AUSA Edward Robinson